

# DavisPolk

Greg D. Andres  
+1 212 450 4724  
greg.andres@davispolk.com

Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017  
davispolk.com

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## **BY ECF**

The Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
United States Court House  
500 Pearl Street  
New York, NY 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

J.P Morgan Chase (“JPMC”) respectfully submits this letter motion to redact portions of the August 6, 2024 hearing transcript in this matter. A table of JPMC’s proposed redactions appears below, and a copy of the transcript with the proposed redactions is submitted herewith as Exhibit A.

The redactions, which are limited to JPMC employee names, are necessary to protect the privacy of non-party JPMC’s employees. This court has ruled that “case law holds that [an employee’s name] may be redacted where an employee is not a party to action in light of the individual’s privacy interests.” *Oklahoma Firefighters Pension & Ret. Sys. v. Musk*, No. 22 CIV. 3026, 2024 WL 2305264, at \*2 (S.D.N.Y. May 20, 2024).

## **Proposed Redactions:**

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Respectfully submitted,

/s/ Greg D. Andres

Greg D. Andres

Sidney Bashago

Katherine Swan

Michelle Adler

Christian Hines

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue

New York, New York 10017

(212) 450-4000

greg.andres@davispolk.com

sidney.bashago@davispolk.com

katherine.swan@davispolk.com

michelle.adler@davispolk.com

christian.hines@davispolk.com

*Attorneys for Non-Party JPMorgan Chase  
Bank, N.A.*